

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RUSSELL CORNELL, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED

PLAINTIFF,

VERSUS

NINE ENERGY SERVICE, LLC

DEFENDANT.

CIVIL ACTION NO.: 4:15-CV-00620

JURY TRIAL DEMANDED

COLLECTIVE ACTION
PURSUANT TO 29 U.S.C. §216(B)

JOINT MOTION TO CONSOLIDATE

Plaintiffs Russell Cornell and Jarod Alexander (“Plaintiffs”), on behalf of themselves and all opt-in Plaintiffs, and Defendant Nine Energy Service, LLC (“Nine”) (collectively referred to as “the parties”) respectfully request this Court consolidate the below similar FLSA cases into this lawsuit for settlement approval and administration:

Tyson Dooley, et al. v. Nine Energy Services, LLC, Civil Action No. 4:15-cv-02433, United States District Court for the Southern District of Texas (Houston) (“*Dooley*”); and

William M. Turner, III, et al. v. Nine Energy Service, LLC, Civil Action No. 4:15-cv-03670, United States District Court for the Southern District of Texas (Houston) (“*Turner*”).

Pursuant to Federal Rule of Civil Procedure 42, these cases would properly be consolidated because they involve common issues of fact and law involving wage and hour claims asserted by field employees of Nine and/or one of its affiliated companies. The claims raised in *Dooley* and *Turner* are subsumed in/similar to the claims raised in *Cornell*, and the parties’ settlement agreement resolves the claims of all plaintiffs in these cases on a global basis. Thus consolidation will allow for one Court to consider approval of the settlement of the duplicative/similar claims, oversee administration of the settlement, and permit the use of a single, uniform settlement process.

Upon filing this Joint Motion to Consolidate, the parties will file a notice of this Motion in each of the above-referenced cases.

The parties respectfully request this Court grant their Joint Motion to Consolidate and order *Dooley* and *Turner* consolidated with this lawsuit for further proceedings.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I served this document via the Court's CM/ECF system on January 31, 2017.

s/ Jessica M. Bresler
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ORDER GRANTING JOINT MOTION TO CONSOLIDATE

Pursuant to Federal Rule of Civil Procedure 42, and having considered the parties' Joint Motion to Consolidate, the Court finds the Motion has merit and should be granted in its entirety.

Accordingly, it is hereby ORDERED that the Motion is GRANTED, and that the cases styled *Tyson Dooley, et al. v. Nine Energy Services, LLC*, Civil Action No. 4:15-cv-02433, United States District Court for the Southern District of Texas (Houston) and *William M. Turner, III, et al. v. Nine Energy Service, LLC*, Civil Action No. 4:15-cv-03670, United States District Court for the Southern District of Texas (Houston) are consolidated with and into this case.

Date: _____

United States District Judge